

SAN FRANCISCO BAY JOINT VENTURE
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JUL 01 1998

June 30, 1998

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Wildlife Conservation Board

Lester Snow
CALFED Bay-Delta Program
1416 Ninth St., Suite 1175
Sacramento, CA 95814

RE: Comments on the CALFED Bay-Delta Program Programmatic EIR/EIS

Dear Mr. Snow:

The comments of the San Francisco Bay Joint Venture focus on the Ecosystem Restoration Program (ERP) element of the CALFED Bay-Delta Program. The ERP has been gradually improving with each draft and the staff should be commended for their efforts. Some problems still remain and I have highlighted those areas below.

Ecosystem Restoration. The San Francisco Bay Joint Venture has had concerns about CALFED's ecosystem approach. To date, most of the restoration projects that have been funded through the Ecosystem Roundtable have been in the Central Valley and Delta and targeted almost exclusively on fish. We recognize why this is necessary at this point in time but this is a far cry from a comprehensive ecosystem approach. We would like to see the program become a true Bay-Delta ecosystem program that looks at all species in the entire ecosystem and where an ecosystem does not end at an arbitrary line drawn across San Pablo Bay. How can you restore an ecosystem if integral regions are not incorporated? For example, if invasive species are to be controlled, actions will have to be taken throughout the Bay or the problems will continue to re-occur. It will not suffice to just address the problems of invasive species in the North Bay or Delta as is suggested by the ERP.

Inclusion of San Francisco Bay. Progress has been made in this area. The document entitled "Developing a Strategic Plan for Ecosystem Restoration" mentions that programmatic actions will be taken in South San Francisco Bay, near ocean waters and watersheds above the dams. However, Volumes I and II (page 3 in both documents) do not mention that the Central and South Bay areas will be addressed at a programmatic level. The descriptions of the program's geographic scope need to be consistent and need to include the Central and South Bay regions.

Phasing of the Implementation. The documents should state very clearly when actions will be undertaken outside of the primary geographic scope. Just when will ecosystem restoration funding be seriously considered for the Central Bay and South Bay areas? Five years? Ten years? Some of these questions may be answered by the "Strategic Plan for Ecosystem Restoration" and we would like to be involved in the process to develop this plan.

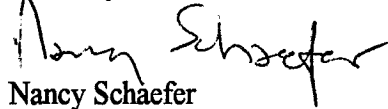
Finalizing the ERP. The ERP is a very complex document. It will take many years to implement and CALFED cannot be expected to do it all. CALFED is, and should, look for partnerships wherever it can to meet its goal of ecosystem restoration. To facilitate

that process, we suggest that CALFED consider holding workshops (similar to those held by the Roundtable process) in each Ecological Zone before finalizing the ERP to insure as much regional input as possible. The Joint Venture will be happy to host such a workshop.

The San Francisco Bay Regional Wetlands Ecosystem Goals Project (Goals Project) has released its first public draft. The Goals will be completed this fall. The San Francisco Bay Joint Venture is writing an Implementation Strategy using the Goals Project information as the biological foundation. This strategy will meet many of CALFED goals for the region.

Thank you for the opportunity to comment and the Joint Venture partners look forward to working with CALFED to implement the ERP.

Sincerely,



Nancy Schaefer
Coordinator

Cc: SFBJV Management Board

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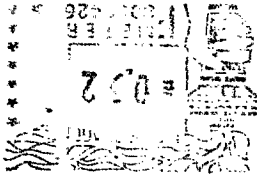
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